

Schary, Claire

From: Schary, Claire
Sent: Monday, September 29, 2014 5:48 PM
To: Bobby Cochran
Cc: Carrie Sanneman; 'Tim Wigington' (Tim@thefreshwatertrust.org)
Subject: RE: Thinking about TMDLs and Trading--Paper for USDA
Attachments: Building TMDLs to Better Support Trading - Draft -15 Sept (3) - Schary comments.docx

Bobby – I really wish I had time to get some people in my unit to look at this who are more expert on what each element of the TMDL covers and what is allowed, or not allowed for interpreting those TMDL elements. We are all extremely busy, unfortunately, and the unit retreat last week took away 3 days so now we're all further behind. However, my comments will give you a sense of what I was concerned about. And since our region hasn't yet seen a TMDL that mentions trading as its implementation option, I don't have anything to refer to (but maybe we should look at the upcoming draft of the Lower Boise TMDL as our first pilot project on that).

If there's another round of review, I'd like to get more people at EPA to look at it. We get nervous when others interpret our TMDL program to USDA for us, since there's already a lot of confusion and tension on that topic with them.

-- Claire

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From: Bobby Cochran [<mailto:cochran@willamettepartnership.org>]
Sent: Monday, September 15, 2014 11:15 AM
To: Schary, Claire; FOSTER Eugene P; marti.bridges@deq.idaho.gov; hbre461@ECY.WA.GOV; 'Tim Wigington' (Tim@thefreshwatertrust.org)
Cc: Smith, Brooks M.; brent.fewell@troutmansanders.com; Mindy Selman; Carrie Sanneman
Subject: Thinking about TMDLs and Trading--Paper for USDA

Hi folks,

WP has been working with World Resources Institute to give the Office of Environmental Markets some papers on trading--specifically on verification and building TMDLs with trading in mind.

Knowing how much you all love TMDLs, I wanted to give you the draft of where we are now with two questions:

- Are we saying anything really dumb?
- Is there and insight, point, analysis we could provide that would make these much more useful?

Our primary audience are state WQ agencies, but also written in plain enough English to be accessible to other watershed stakeholders. Any comments you might have in the next 1-2 weeks would be real helpful. Happy to talk through it too. Thanks!

Bobby